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10 Attorneys for Reddit, Inc.  
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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 **Originating Case:** *After II Movie LLC., et al. v. Grande Communications*  
16 *Networks LLC, No. 1:21-cv-00709 (W.D. Tex.)*

17  
18 In re Subpoena to:  
19 Reddit, Inc.

**CASE NO. 3:23-mc-80173**

**DECLARATION OF HAYDEN M.  
SCHOTTLAENDER IN SUPPORT  
OF REDDIT, INC.'S OPPOSITION  
TO PLAINTIFFS' MOTION TO  
COMPEL**

Date: July 27, 2023

Time: 9:30 a.m.

Judge: Hon. Laurel Beeler

1 I, Hayden M. Schottlaender, declare as follows:

2 1. I am Counsel at the law firm Perkins Coie LLP in Dallas, Texas and am  
3 one of the attorneys representing Defendant Reddit, Inc. (“Reddit”) in this action. I  
4 have personal knowledge of the facts set forth in this declaration and am  
5 competent to testify.

6 2. Reddit is a community of online communities. Within those  
7 communities, called “subreddits,” users gather to discuss shared interests. Users  
8 generally participate on the platform pseudonymously, and Reddit does not require  
9 that they use their real names.

10 3. On August 13, 2021, Plaintiffs filed suit in the Western District of  
11 Texas, pursuing a vicarious copyright infringement action against an internet  
12 service provider, Grande Communications Networks (“Grande”). **Exhibit A** is a  
13 true and correct copy of the Second Amended Complaint filed May 18, 2022 in the  
14 originating Western District of Texas lawsuit.

15 4. On June 15, 2023, the Western District of Texas issued a Second  
16 Amended Joint Scheduling Order. A true and correct copy of that order is attached  
17 as **Exhibit B** to this declaration.

18 5. On April 26, 2023, the Western District of Texas issued an order in the  
19 above-referenced copyright action. A true and correct copy of that order is attached  
20 as **Exhibit C** to this declaration.

21 I declare under penalty of perjury that the foregoing is true and correct.

22  
23 Executed on July 5, 2023, at Dallas, Texas.

24  
25 /s/ Hayden M. Schottlaender

26 Hayden M. Schottlaender

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